

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

Kevin P. Loughman,
Plaintiff,
v.
Maura Mahoney, Maura Feeley, Lotus
Development Corporation, and First Security
Services Corporation,
Defendants.

CIVIL ACTION NO. 04 CV 12316 WGY

**DEFENDANTS MAURA FEELEY & FIRST SECURITY SERVICES CORPORATION'S
MOTION TO STAY PROCEEDINGS AND SUPPORTING MEMORANDUM**

Defendants Securitas Security Services USA, Inc. as successor to First Security Services Corporation (“Securitas”), and Maura Feeley (collectively, “Defendants”) hereby move to stay all proceedings with respect to this action and request that this Court order that said matter is administratively closed until such time as any party moves to re-open same.

As grounds therefore, the Defendants state as follows:

1. On November 1, 2004, the Plaintiff, Kevin P. Loughman, who is proceeding *pro se* in this action, filed a complaint with this Court. The Defendants waived service of the summons on November 17, 2004 pursuant to Fed. R. Civ. P. 4(d).
2. On December 10, 2004, the Plaintiff served the Defendants with an Urgent Motion for 90 Day Continuance, a copy of which is attached herewith as Exhibit A, and which was docketed by this Court on December 15, 2004.

3. The Plaintiff's motion requests that the Court continue all required actions with respect to this matter for 90 days. As grounds for his motion, the Plaintiff states that he is temporarily hospitalized in London, England and awaiting open heart surgery, with an anticipated recovery period of 60 to 90 days. The Plaintiff has also attached a doctor's letter in support of his motion. *See Exhibit A.*

4. Prior to receipt of the Plaintiff's motion, counsel for the Defendants, Shireen Arani, Esquire, received a telephone voicemail message from a woman identifying herself as the Plaintiff's niece. She stated that she was calling, on behalf of the Plaintiff, to communicate that there had been a "medical development out of the country." She stated that the Plaintiff was currently "unreachable" and provided no telephone number or other contact information for herself.

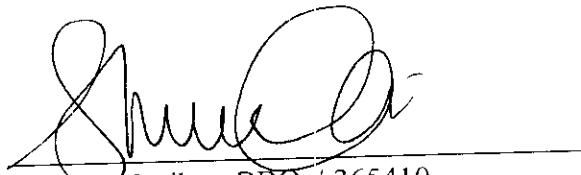
5. In light of Plaintiff's representation regarding his medical condition, Defendants have not sought to confer with Plaintiff pursuant to Local Rule 7.1(A)(2) prior to the filing of this motion.

6. Others named as defendants, Lotus Development Corporation and Maura Mahoney, have not yet been served.

7. Defendants anticipate filing a motion to dismiss in response to Plaintiff's complaint that will necessitate a response from him. Given the unexpected circumstances described herein, which will prevent the Plaintiff from responding to any motion or from effectively communicating concerning the pending matter, a stay of the proceedings in this action will serve the interests of justice and prevent prejudice to all parties involved.

WHEREFORE, Defendants Securitas and Maura Feeley hereby request that this Court stay all proceedings in this action and order that the matter is administratively closed until any party moves to re-open same.

SECURITAS SECURITY SERVICES USA, INC.
and MAURA FEELEY,
By their Attorneys,



Jean A. Musiker, BBO # 365410
Shireen G. Arani, BBO # 654461
Sugarman, Rogers, Barshak & Cohen, P.C.
101 Merrimac Street
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Dated: December 20, 2004

CERTIFICATE OF SERVICE

I, Shireen G. Arani, hereby certify that on the above date I served the within document by mailing a copy of same, postage prepaid, to the plaintiff, Kevin P. Loughman, 4 Marrigan Street, Arlington, MA 02474.



Shireen G. Arani